him with all the original grantees' rights under the deed. *Rush* v. *Hilton*, (1909), — S. C. —, 65 S. E. 525.

There are two views as to the effect of an indorsement upon a deed assigning the grantee's interest in the deed. It has been held by some courts to pass the legal title to the land described in the deed, upon which the indorsement was made, as in *Lemon* v. *Graham*, 131 Pa. St. 447, 19 Atl. 48, where the grantee named in the deed indorsed upon it an assignment of all his right, title and interest, "in and to the within deed." Also, the words "I assign the within to A B for value received" indorsed upon a deed and signed and acknowledged by the grantor were held sufficient to convey the legal title. *Harlowe* v. *Hudgins*, 84 Tex. 107, 19 S. W. 364. Other courts have held in similar cases that such an indorsement conveys no legal title, and at best entitles the assignee to relief in equity, as upon an executory contract. *Lessee of Bentley's Heirs* v. *Deforest*, 2 Ohio 221; *Dupont* v. *Wertheman*, 10 Cal. 354; *Porter* v. *Read*, 19 Me. 363.

DIVORCE—ALLOWANCE OF TEMPORARY ALIMONY.—Appeal from an order of the court below, allowing the wife temporary alimony during the pendency of her suit for divorce. She had realty valued at $35,000 and horses worth $1,300, given to her by the husband. *Held*, that the awarding of temporary alimony is within the discretion of the court, and that the wife is not obliged to sell her property to carry on the suit. *Robertson* v. *Robertson* (1909), — Mo. App. —, 119 S. W. 533.

The general rule is that temporary alimony will be granted when the wife has not sufficient means to maintain or defend the suit for divorce, in addition to means to keep herself in comfort. *Cooper* v. *Cooper*, 85 Ill. App. 575, judgment affirmed, 185 Ill. 163, 56 N. E. 1059. But when the wife is independent of her husband and has sufficient money to maintain herself and to prosecute or defend the divorce suit, she is not entitled to temporary alimony. *Lambert* v. *Lambert*, 109 Mo. App. 19, 84 S. W. 203; *Richardson* v. *Richardson*, 94 N. Y. Supp. 582; *Carlin* v. *Carlin*, 65 Ill. App. 160; *Haddon* v. *Haddon*, 36 Fla. 413, 18 South. 779; *Coles* v. *Coles*, 2 Md. Ch. 341; *Porter* v. *Porter*, 41 Miss. 116; *Maxwell* v. *Maxwell*, 28 Hun 566. In the principal case the wife certainly would have had enough money if she had sold her property, but the court ruled that such a sale is not necessary and that temporary alimony will be granted if the income from the wife's property is not sufficient to maintain her in comfort and to defend or prosecute the suit. *Miller* v. *Miller*, 75 N. C. 70. The principal case is peculiar in that it comes within two months of a case in the St. Louis Court of Appeals, in which the defendant wife was possessed of an estate of $5,000, and the court ruled that where the wife's personal necessities are less than the property held in her own right, that property must be practically consumed before the husband will be required to respond to her wants. *Rutledge* v. *Rutledge*, — Mo. App. —, 119 S. W. 489.

ELECTIONS—USE OF VOTING MACHINES—UNCONSTITUTIONAL.—The Legislature of Ohio had passed several laws to provide for the use of voting machines in elections. The Supervisors of Elections in accordance with the said